

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
GIDEON RAPAPORT,

Plaintiff,

-against-

AJAY SRINIVASAN IYER,  
ZACHARY GEORGE GARRETT, and  
RICHARD ALLEN EPSTEIN,

Defendants.  
-----X

Case No.: 1:23-cv-06709 (JGLC)

**AFFIDAVIT OF  
CRISTINA MARTINEZ SQUIERS  
IN SUPPORT OF MOTION FOR  
ADMISSION *PRO HAC VICE***

I, Cristina Martinez Squiers, declare:

1. I am senior counsel with the law firm of Schaerr | Jaffe LLP, located at 1717 K Street NW, Suite 900, Washington, DC 20006.

2. This Affidavit is submitted in support of my motion for admission to practice *pro hac vice* for the purposes of appearing and participating in this case as counsel for Defendants Ajay Srinivasan Iyer and Zachary George Garrett.

3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the Bar of the State of Texas (Bar No. 24093764).

4. There are no pending disciplinary proceedings against me in any state or federal court, I have never been convicted of a felony, nor have I ever been censured, suspended, disbarred or denied admission or readmission by any court.

5. I am aware that I am subject to the local rules of this Court, including the Rules governing discipline of attorneys.

WHEREFORE, for the foregoing reasons, Cristina Martinez Squiers respectfully submits that this Court grant entry of an Order of Admission *Pro Hac Vice* to participate

in the above-captioned action as counsel for Defendants Ajay Srinivasan Iyer and Zachary George Garrett. I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 17, 2024 in Dallas, Texas.

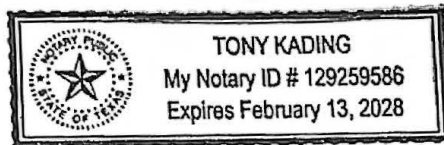
  
Cristina Martinez Squiers

### ACKNOWLEDGMENT

State of Texas  
City of Dallas

The foregoing instrument was acknowledged before me this 17<sup>th</sup> day of July, 2024, by Cristina Martinez Squiers, Counsel for Defendants Ajay Srinivasan Iyer and Zachary George Garrett.

[SEAL]



  
NOTARY PUBLIC

# The Supreme Court of Texas

AUSTIN

CLERK'S OFFICE

I, **BLAKE HAWTHORNE**, Clerk of the Supreme Court of Texas, certify that the records of this office show that

**Cristina Martinez Squiers**

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 4th day of November, 2016.

I further certify that the records of this office show that, as of this date

**Cristina Martinez Squiers**

is presently enrolled with the State Bar of Texas as an active member in good standing.

**IN TESTIMONY WHEREOF** witness my signature



and the seal of the Supreme Court of Texas at the City of Austin, this, the 15th day of July, 2024.

BLAKE HAWTHORNE, Clerk

Blake A. Hawthorne  
Clerk, Supreme Court of Texas

No. 5971C.1